

Laura Vartain Horn (SBN 258485)  
**KIRKLAND & ELLIS LLP**  
555 California Street, Suite 2700  
San Francisco, CA 94104  
Telephone: (415) 439-1625  
laura.vartain@kirkland.com

Allison M. Brown (Admitted *Pro Hac Vice*)  
**KIRKLAND & ELLIS LLP**  
2005 Market Street, Suite 1000  
Philadelphia, PA 19103  
Telephone: (215) 268-5000  
alli.brown@kirkland.com

Jessica Davidson (Admitted *Pro Hac Vice*)  
**KIRKLAND & ELLIS LLP**  
601 Lexington Avenue  
New York, NY 10022  
Telephone: (212) 446-4800  
jessica.davidson@kirkland.com

*Attorneys for Defendants*  
UBER TECHNOLOGIES, INC., RASIER, LLC,  
And RASIER-CA, LLC

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

This Document Relates to:

*Jaylynn Dean v. Uber Techs., Inc.*,  
No. 23-cv-06708

Case No. 3:23-md-03084-CRB (LJC)

**DEFENDANTS UBER TECHNOLOGIES,  
INC., RASIER, LLC, AND RASIER-CA,  
LLC'S [PROPOSED] ORDER GRANTING  
MOTION TO PARTIALLY EXCLUDE  
OPINIONS OF PLAINTIFFS' EXPERT  
VERONIQUE VALLIERE**

Judge: Hon. Charles R. Breyer  
Courtroom: 6 – 17th Floor

Judge: Mag. Lisa J. Cisneros  
Courtroom: G – 15th Floor

1 Having considered Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC's  
2 Motion to Partially Exclude Opinions of Plaintiffs' Expert Veronique Valliere and all exhibits, all reply  
3 briefing, all pleadings and papers of record and on file in this case, and good cause appearing, Defendants'  
4 Motion is GRANTED. Accordingly, Dr. Veronique Valliere's opinions on: (1) Uber's marketing and its  
5 supposed impact on riders and drivers; (2) features of the Uber app that allegedly make female passengers  
6 susceptible to sexual assault; (3) Uber's supposed failure to warn riders of the risks of sexual assault; (4)  
7 the alleged inadequacy of Uber's safety guidelines and other commentary on Uber's values; and (5) Uber's  
8 supposed knowledge are hereby excluded from any trial of this matter. Dr. Valliere is also barred from  
9 regurgitating company documents under the guise of expert testimony.

10 **IT IS SO ORDERED.**

11  
12 DATED: \_\_\_\_\_

By: \_\_\_\_\_

13 CHARLES R BREYER  
14 United States District Judge  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28